

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:21CV564
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
v.)	
)	
REAL PROPERTY LOCATED AT 100)	
MOUNTAIN VIEW DRIVE,)	
MORELAND HILLS, OHIO,)	
CUYAHOGA COUNTY PERMANENT)	
PARCEL NOS: 913-06-001, 913-06-005,)	<u>MOTION FOR DEFAULT JUDGMENT AS</u>
et al.,)	<u>TO THE DEFENDANT 1996 PORSCHE 911</u>
)	<u>AND THE 2019 NAUTIQUE G25 BOAT AND</u>
Defendants.)	<u>BOAT TRAILER</u>

Plaintiff, the United States of America, by and through undersigned counsel, respectfully moves the Court, pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, for judgment by default against Carey Senders and Ilan Senders and all other potential parties for their failure to file an answer with respect to the following defendant properties:

1996 PORSCHE 911 TURBO, BLACK IN COLOR, VIN: WP0AC2991TS376255;

2019 NAUTIQUE G25 BOAT, HIN: CTC95115K819, WITH A 2019 EXTREME
BOAT TRAILER, VIN: 5DBBB2734KZ005090;

As evidenced by the attached affidavit of the undersigned counsel, the United States has (1) filed a verified Complaint in Forfeiture against the defendant properties; (2) provided notice, by certified mail, to Carey Senders, the titled owner of the 1996 Porsche 911, described above and to Ilan Senders, the titled owner of the 2019 Nautique G25 Boat with Boat Trailer, described

above; and (3) published Notice of the forfeiture on an official internet government forfeiture site as required by Rule G(4) of the Supplemental Rules of Certain Admiralty and Maritime Claims and Asset Forfeiture Actions, which govern in rem proceedings. Carey Senders and Ilan Senders, and all other potential parties, have failed to file an answer in this judicial action with respect to the defendant 1996 Porsche 911, described above and to Ilan Senders, the titled owner of the 2019 Nautique G25 Boat with Boat Trailer, described above. Accordingly, default judgment should be entered against Carey Senders and Ilan Senders, and all other parties who have failed to come forward in this action.

A proposed judgment entry is attached hereto.

Respectfully submitted,

BRIDGET M. BRENNAN
Acting United States Attorney

By: /s/ Henry F. DeBaggis
Henry F. DeBaggis
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Default Judgment, with attached Affidavit and a proposed judgment entry, was served was served by regular mail on this 29th day of September, 2021, to the following:

Cary Senders
14393 Washington Blvd
University Heights, Ohio 44118

Ilan Senders
14393 Washington Blvd
University Heights, Ohio 44118

/s/ Henry F. DeBaggis
Henry F. DeBaggis
Assistant U.S. Attorney

